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To: Jan Cahill
From: Leslie Howe, Quality Improvement Specialist
Re: 2006 Quality Assurance Review

The Developmental Disabilities Program completed an on-site review of Quality Life Concepts January 9-20, 2006 utilizing the references and guidelines found in the "Quality Assurance Process for Adult and Group Home Services" dated July 1, 2005. The following report contains the findings, comments, and recommendations from a review of services provided by Quality Life Concepts. A sample of consumers from Residential, Day, Supported Employment, Supported Living, and Community Supports services was used. Quality Assurance Observation Sheets (QAOS) were written for positive and negative findings. A number of other findings were noted. Deficiencies will require a written response by March 8, 2006.

Please remember this is a snapshot of services and may not reflect other findings from more detailed reviews done internally or by other licensing agencies. We wish to thank the staff at Quality Life Concepts for their cooperation in the review.

February 10, 2006

QUALITY ASSURANCE REVIEW

Scope of Review

The on site review for Quality Life Concepts was completed January 9-20, 2006 by the Developmental Disabilities Program with Leslie Howe, Quality Improvement Specialist, taking the lead. Other staff assisting included Bruci Ann Hall, Regional Manager; Lori Wertz, Quality Improvement Specialist; Catherine Murphy, Quality Improvement Specialist; and Kathleen Kaiser, Quality Improvement Specialist. The period for the review is fiscal year 2006 with the targeted completion date of mid-February 2006. All areas of service were reviewed: Residential - Group homes and Supported Living, Work/Day services and Supported Employment, and Community Supports. There were 25 folks in the Great Falls random sample and 3 folks were added from the Conrad/Shelby area. Per the Developmental Disabilities Quality Assurance Policy, all of the Community Supports individuals were included in the sample. References and guidelines used can be found in the Developmental Disabilities Program "Quality Assurance Process" dated July 1, 2005.

General Areas

A. ADMINISTRATIVE

Accreditation

Quality Life Concepts has national accreditation by CARF. Their last CARF survey was completed in 2004. Quality Life Concepts received a three-year accreditation, the highest accreditation granted by CARF, and they are scheduled for review again in September 2007. Because highlights were noted in last year's review, it will not be revisited again in this one.

Agency internal communication systems:

Quality Life Concepts appears to have a usable internal communication system. Despite the size and distances covered in the agency, they appear to get information shared.

Fiscal (results of A133 audit, referrals to Medicaid Fraud or QAD review, client funds & record keeping).

The Desk Review of the A-133 Audit report was done by the auditor's office but the outcome is still pending so results of the audit are not yet available. A referral was made recently to Medicaid Fraud and QAD concerning embezzling from one of the fiscal employees. Since the Auditors, Social Security Administration, and Medicaid Fraud are involved, the Developmental Disabilities Program is not going to pursue these fiscal issues until such time as the pending legal issues are resolved and other agencies provide us recommendations on what to do or how to proceed.

Significant Events from the agency

This Quality Improvement Specialist asked Quality Life Concepts CEO Jan Cahill to give a summary to include in this report. He had his management staff send responses. Human Resources reported that Quality Life Concepts has maintained the turnover rate – the CSS/DAD had a 1% increase, and the agency as a whole had only a 3% increase. Total first report claims went down from 124 in 2004 to 90 in 2005. A breakdown includes claims that were reported decreased from 80 to 58, claims that needed medical attention decreased from 44 to 32, claims that required time lost from the job decreased from 9 to 3. The interpretation given in regards to this trend was that Quality Life Concepts is training safe practices and promoting safety in the workplace. Responses from other managers are found in the body of this report in their respective sections.

Jan Cahill also wanted it mentioned that Quality Life Concepts had the largest salary increase in their history (\$1 per hour) in response to the legislative action regarding Tobacco Tax revenues. Quality Life Concepts gave one of the highest wage increases statewide.

Policies & administrative (DDP) directives

Quality Life Concepts added an Incident Management Coordinator position with respect to the new state Incident Management Policy and continues to update their Incident Management Policy to reflect ongoing changes in Developmental Disabilities Program policy. There has been a recent change in Critical Incident Coordinators and this change has been a positive one for Quality Life Concepts. Quality Life Concepts is also participating in "bridge building" meetings on a regular basis with Easter Seals. This is a positive step for both providers. The Developmental Disabilities Regional Office has encourages and applauds this type of teamwork.

Quality Life Concepts is also participating in the Rates Reimbursement Project in Region II.

Great strides have been made by Quality Life Concepts in developing a better understanding of and working relationship with Adult Protective Services. Quality Life Concepts attends the meetings sponsored by Adult Protective Services for the Developmental Disabilities Program, Providers, and Case Managers in Region II.

Quality Assurance Observation Sheet # E-1

Licensing

Quality Life Concepts has 17 group homes. The licensing review happened to coincide with the Developmental Disabilities Program on-site visits. The Developmental Disabilities Program received feedback from licensing on their findings. The deficiencies included a basement

bathroom without a window at Riverview group home had a fan that was not operating; it was fixed immediately. South Park group home had a similar situation in apartment #1. The vent was also fixed immediately. Also at South Park group home: apartment #1 has water higher than 120 degrees and apartment #2 has water too cool. Both water heaters were replaced the following week. Berkner Heights and Central Park group homes both had a lack of an annual dental for consumers living there. Both residents had no teeth but no dentures and have since had dental appointments. The plans of correction were offered and completed in 3 weeks. Overall hygiene and housekeeping standards improved again over the last year, which had no deficiencies. The sanitarian approved the 15 facilities in Great Falls and the two in Conrad. The fire Marshall completed his report in December 2005 and approved the facilities for licensure. Lynn Morley stated this was the best fire inspection they have had in the group homes in years. 12 group homes had no violations and 7 group homes had no violations during fire tours.

Quality Life Concepts also has a current Department of Labor Certificate on file for the Conrad Work Activity Center.

QAOS Sheets

Routine QAOS Sheets written in the past year include the following:

- inappropriate response to the medical needs of a consumer that was shared with Easter Seals and this was responded to by the two agencies coming up with a joint policy
- medical neglect where consumers were not seeing doctors annually
- medication errors
- not following the Incident Management Policy
- consumers without lunches
- Willow Group Home without paper towels or toilet paper in bathrooms and not enough staff on duty
- Western Star group home not enough staff on duty
- a rights restriction not approved by the IP team
- use of unapproved restraints
- Willow group home general poor care and IP objectives not followed/implemented
- transportation/safety issues
- Treasure State group home had a consumer's safety harness tied too tight and left marks on her
- Treasure State group home pushing consumers to walk faster
- incident reporting for emergency medical issues
- untimely reporting to Adult Protective Services
- failure to provide immediate medical attention to an injured consumer
- staff giving medications that are not certified to do so.

The positive observation sheets include the following:

- preventing a feeding tube insertion and nursing home placement
- staff coming in from vacation to address a consumer's behavior issues
- developing a joint incident management procedure with Easter Seals
- Conrad/Shelby Supported Living consumer supports
- a good transition for a consumer from Conrad to Great Falls
- proactive approach by the Quality Assurance team for health and safety
- prevention of a medication error
- a new way to document to doctors consumers' medical information to prevent medication interactions.

Quality Assurance Observation Sheets from last review included the following:

- radio and printed ads do not carry state funding disclaimer
- agency policy doesn't follow ARM
- Waiver and Medicaid expenses to consumers and ethics policy and staff reimbursements
- Power of Attorney documents not considered legally binding and place the agency at risk
- recreational outings do not reflect individual choice and are administrative in nature
- homes not stocked with toileting supplies
- IP objectives not measurable/related to long range goals/data missing/quarterly reviews do not reflect progress or lack of it
- training orientation not approved by Developmental Disabilities Program and staff in intensive areas not enrolled within timeframes set by ARM
- consumers do not participate in hiring of their staff
- staff survey questions were not answered correctly or required prompting
- consumer not paid under DOL for work performed
- bowel charts not consistently available or used for consumers taking motility drugs
- incident reporting timelines not met.

After much deliberation all responses to the observation sheets were accepted.

Quality Life Concepts was placed on a corrective action plan during this review period due to issues with movement of consumers within the corporation without IP team approval, the new congregate living apartments leased by Quality Life Concepts with gas stoves and difficult stairs to maneuver, expansion of services through bed availability under

the guise of downsizing, staff need immediate access to support and on-call covered as in the contract, IP teams need to be given appropriate and meaningful information to ensure proper planning, ensure that Supported Living staff are available as promised, and a comprehensive plan for the day program is still needed. The corrective action plan was completed within the required timeframes.

Medication Errors

Quality Life Concepts documents medication errors and sends this information in Incident Reports and trends to DDP. In the past year medication errors include staff errors such as meds not picked up at the pharmacy, medications not given, medications given late, medications given by non-medication certified staff, dates on medication packets changed. The pharmacy is contacted when errors were discovered most of the time. Adverse effects were experienced as a result of some of these errors. Another discovery regarding medication administration was made by the Quality Assurance department at Quality Life Concepts concerning the use of a fictitious "Dr. Feelgood" as the prescribing doctor on the sheet received from the pharmacy regarding over the counter medications. This was found during an onsite visit during the last year at one of the group homes and the answer given by the group home manager at that time was inaccurate. The Quality Assurance staff finally dug further and this was finally formally addressed. The actual physician who prescribed the medications will be noted on the sheets from now on. It remains important that Quality Life Concepts continue to address medication errors for the health and safety of the individuals they serve.

Rights Restrictions

Quality Life Concepts has no behavioral programs that use aversive techniques at this time. The Developmental Disabilities Program has approved most rights restrictions. This will be discussed later in the residential services section.

Incident Reporting (Trends)

Incident Reports are written most of the time when appropriate and routed according to agency policy. There has been ongoing difficulty getting the Incident Reports to the Developmental Disabilities Program in a timely manner. Quality Life Concepts is striving to meet the timelines now and are currently meeting the timelines given in the policy. Critical and Reportable incidents are now e-mailed to the Quality Improvement Specialists after the Critical Incident Coordinator has reviewed them. However, despite the two trainings done by the Developmental Disabilities Program Quality Improvement Specialists who work with Quality Life Concepts and the numerous training opportunities offered by Quality Life Concepts staff, Incident Reports are still not correctly or completely filled out. The information on the Incident Reports is imperative for the folks in

Helena to complete their database. This was mentioned in last year's review as well.

Quality Assurance Observation Sheet # 1

Incident trends are being tracked by Quality Life Concepts. Incident Reports were found in consumer files. Trends are sent monthly to the Quality Improvement Specialist. Quality Life Concepts is now striving to follow the ever-changing Incident Management Policy. They have had difficulty following/implementing the new policy and updates to it in the past. Reports to Adult Protective Services and the Developmental Disabilities Program have improved. Quality Life Concepts has recently hired a new Incident Management Coordinator who is doing an impressive job organizing Incident Reports, investigations, and tracking trends. Their Incident Management Committee meets weekly to discuss critical incidents. Quality Life Concepts has recently started completing periodic high-risk review meetings with the CORE team and Case Managers. It was refreshing to learn at the first meeting that for the most part the IP teams were already aware of the difficulties individuals were facing and were addressing them. Quality Life Concepts has numerous trained investigators performing critical incident investigations. Feedback has been given to the Critical Incident Coordinator on the quality of the investigations. Although there have been positive developments, there remains room for improvement in this area. This was a finding last year as well. This Quality Improvement Specialist believes that the Critical Incident Coordinator is already addressing this but it may take some time.

Criminal Background Checks

The Human Resources department staff was gracious in assisting the Quality Improvement Specialist in obtaining the required information from employee records. Four new and veteran employee files were reviewed. All files had Department of Justice criminal background checks and documentation of training and when it occurred. Training was initiated in the proper time frame per the Developmental Disabilities Program policy.

Fire Drills

Documentation was available through the Health and Safety Manager for fire and other evacuation drills for every site and are filed in her office. Documents were reviewed with this Quality Improvement Specialist. Two residents in a senior home will refuse to evacuate most of the time and staff have a written plan on how to remove them from the home should an actual emergency take place. Other homes have identified problems with evacuations and have plans to address this. One group home had no report of a drill occurring in March 2005. Fire extinguishers are inspected yearly. As stated earlier in this report, the fire inspector found no violations at Quality Life Concepts sites.

Appendix I

There are no specific contractual agreements between DDP and Quality Life Concepts requiring staffing ratios due to the new rates project. During on-site visits it was noted that several of the group homes were down a staff person. **This will be addressed in a Quality Assurance Observation Sheet in the residential section.**

Consumer Satisfaction Surveys were available to the reviewers. They were completed by Quality Life Concepts staff and were found with IP information. Quality Life Concepts also completes staff satisfaction surveys. They are due again in March 2006. The Human Resources department takes the data and compiles all the responses into a report that is reviewed. They ensure privacy for employees by typing the report. The Human Resources keeps the data in their office.

The reviewers completed staff interviews in each service area. These will be discussed later in the report in sections for each of the services.

Orientation Training

Employees at Quality Life Concepts are enrolled in a training curricula approved by the Developmental Disabilities Program. Quality Life Concepts has an extensive orientation training package, which includes their Induction: New employee training, OSHA, CPR, first aid, well back, Level 1, Basic and Intermediate Mandt, and Abuse Prevention. Parts of the DDCPT curriculum are used in induction. Their Induction has been expanded to 9 days to include shadowing and training for specific sites. Staff interviews indicate they feel they are getting excellent training. **Quality Assurance Observation Sheet # E-2**

Quality Life Concepts has an internal grievance process and it was found in the policy book. Staff and consumers are informed of the process. Quality Life Concepts policies and procedures do not show that individuals and families in Supported Living have a choice of Supported Living staff. This is a provision of the ARM.

Quality Assurance Observation Sheet # 2

Quality Life Concepts has a lengthy policy and procedure manual and many policies and procedures have been amended or added since the last review. Many of the new/revised policies have been shared with the Developmental Disabilities Program for comments. **The Developmental Disabilities Program would like an updated version of the Quality Life Concepts policy and procedure manual as soon as possible.**

Specific Services Reviewed**A. Residential**

Accomplishments

Quality Life Concepts is striving to offer supports that are appropriate to their clients' needs, in particular their health and safety needs. Many staff people are enthusiastic about their jobs and have developed good rapport with the folks they serve. The CSS manager identified some of the following items as accomplishments during this review period:

Quality Life Concepts CSS division has successfully addressed all issues brought to their attention in Quality Assurance Observation Sheets in order to improve health and safety issues. They have provided in kind services to 11 individuals who were out of their bed placement for extended periods of time due to medical and behavioral issues with no reimbursement from the state. New employee training now includes an approved 10-day training, shadowing, and mentoring process. The establishment of a self-advocacy group was completed and a highway was adopted in order to give back to the community. The emergency response system was modified to include cell phones for all Resource Support Specialists and Resource Coordinators in Supported Living. Policies and procedures have been implemented to improve health and safety preservation rather than just actions following the issue. A transitional living option is now available for individuals' support needs. A periodic service review for group home locations in the CSS division was established and is completed in a quarterly basis. A protocol system to address seizure disorders, medication needs, behavioral needs, and interaction protocols for consumers continues. They also have transitioned consumers from Great Falls to out of town service providers competently.

Programmatic Deficiencies

These were noted previously in this review in the administrative section.

i. HEALTH AND SAFETY**Vehicles**

Most folks in residential services receive transportation from Quality Life Concepts. Group home folks are transported in company vans. Some Supported Living consumers are transported in company or staff vehicles. Although training is completed with staff on safe transportation techniques, there have been numerous accidents and incidents with staff and their transporting of consumers this year. A Quality Assurance Observation Sheet was written in December 2005 regarding trends in unsafe transportation. Unfortunately, despite intense training with the group homes specified in the Quality Assurance Observation Sheet, incidents are still occurring. The Developmental Disabilities Program encourages Quality Life Concepts to monitor staff more closely while they are transporting and offer refresher courses for all staff on techniques for ensuring consumers (and staff) are safe during transportation.

Quality Assurance Observation Sheet #3

Consumers

Quality Life Concepts currently serves 132 consumers in residential services. There are currently 88 folks in their group homes. Quality Life Concepts has 15 group homes in Great Falls and 2 group homes in Conrad. The population of the group homes ranges from seniors to adults to individuals with intensive needs. There are 44 consumers currently receiving Supported Living services in Great Falls and Conrad and Shelby. All of the consumers in residential services who were interviewed were satisfied with the services they receive. Many of the group home residents assisted in tours of their homes during the on-site visits and showed pride in their homes.

Medication Safety (psychotropics, training, programs, prns, certification, errors)

Medication procedures and administration records were reviewed at every location. Some homes had medications still in medication boxes that were past the expiration dates. The Resource Coordinators removed these during the on-site visit with the promise they would be replaced immediately with new ones. The staff people passing medications during the on-site visits were med certified. All medications were found in locked cabinets. One of homes did not highlight the meds given in another site and it appeared to be a med error until the staff explained that the Resource Coordinator usually did that but that there currently was no Resource Coordinator in that home. At another home the staff person passing 5 pm meds did not sign for the medications when they were given and was prompted by this Quality Improvement Specialist during the med book review to sign in my presence --with the strong recommendation that in the future she sign as soon as the medication is given. Medication administration is a serious undertaking and at some homes, it did not appear that this was properly communicated to the staff working there.

Quality Assurance Observation Sheet # 4

PRN protocols were missing from several of the group homes' medication books. It is the understanding of this Quality Improvement Specialist that Quality Life Concepts is in the process of updating the protocols, but old protocols need to be in the book until the new protocols are in place so staff can administer medications correctly. This issue has been addressed with Quality Life Concepts in previous Quality Assurance reviews.

Quality Assurance Observation Sheet # 5

It appears that training for independence with medications is taking place when identified by IP teams according to the sample files reviewed. Some individuals in Supported Living who receive PCA

services get reminders from the PCA to take their medication, some are independent when taking their meds, and some have Supported Living staff assist them until they reach maximum independence in taking their meds.

Sites (appearance, evacuation drills, SL apartments, emergency back-up, etc.)

Group homes:

The group homes at Quality Life Concepts serve seniors, adults, and intensive adults. The homes were mostly clean and sanitary. Central Park and Berkner Heights had stains on the rugs that were unsightly. Central Park also had leaves blocking the fire exits from the basement; otherwise egress was good in the homes. There are ongoing concerns about Riverview's steps involving safety for the women who reside in this home and Quality Life Concepts has taken as many precautions as they can to ensure the ladies who reside there are safe. Hot water temperatures were below 120 degrees in all but two sites—Tucson and Riverview. The smaller bathtub at Riverview also had a plugged drain and this Quality Improvement Specialist had to manually hold the drain lever to get it to drain after checking the water temperature. Staff reported they submitted a work order that day to get it fixed. All homes reported they have overnight awake night staff. Checklists were in place for these staff to do housekeeping and safety checks on the consumers. Some of that data was missing in more than one of the homes.

All homes had adequate supplies in the bathrooms. Cleaning supplies were locked up. None of the homes reported having "rules" but say they discuss being courteous and respectful to each other in the house meetings.

None of the group homes had seizure procedures posted for individuals who have seizures. When asked why, the staff responses were always: "The Quality Assurance department said it was against HIPAA regulations to do so." (Note: in Conrad, staff offered to immediately post bathing procedures and did not cite HIPAA as a concern).

Quality Assurance Observation Sheet # 6

When this Quality Improvement Specialist spoke to the Quality Assurance department, the response was very different. As a result of this conversation, each group home was directed by the Quality Assurance department on January 25, 2006 to post a fluorescent green laminated card with instructions of what to do in the event an individual has a seizure while in the shower or

bathtub. They are to be posted in each of the bathrooms used by staff/consumers regardless of the presence of a shower or tub. They are to be used to supplement the seizure protocols for the individuals who have seizures. The method of how to post the individual protocols developed by the IP teams has not been officially mandated. Suggestions were given on how to protect confidentiality and still provide safe bathing for consumers with seizures. This Quality Improvement Specialist informed the group home staff that a protocol filed with the IP and occasionally reviewed by staff would not save someone's life if they have a seizure in the bathroom. Staff members need to have the protocol in the bathroom with them!

Several of the group homes either had no Resource Coordinator or had a new Resource Coordinator who was still getting on her feet so to speak. Training was being provided to the new Resource Coordinators, but for the most part, the staff was not familiar with the consumers and the staffing issues in the homes. Staff turnover is a given in any provider serving Developmental Disabilities individuals. Unfortunately, these were not the only homes to have unorganized paperwork or missing paperwork and some new Resource Coordinators reported stacks of filing that was not completed. This is an issue involving quality of services and the health and safety of the individuals served in those homes. Missing/not filed protocols resulted in unsafe conditions for the individuals in the group homes.

Quality Assurance Observation Sheet # 7

Hansen group home is a former group home that was closed and the individuals served there moved to another home. It was reopened after some renovations to serve an individual who could no longer live in the group home she had previously lived in due to medical issues and a doctor's order for no stairs. Quality Life Concepts promised her family they would continue to serve her. Hansen has the capacity to serve 3 individuals in the group home half. This has allowed another group home to downsize to a more servable number of residents. A Supported Living consumer lives in an apartment in the basement of Hansen. This individual was in a group home setting and his team decided Supported Living was a better fit for his needs. This apartment setting was created to serve him. Supported living and group home staff at this site serve the individuals separately.

Quality Assurance Observation Sheet # E-3

Fire and other emergency drills are completed monthly in the group homes. Ramur Villa did not have documentation of a drill in March 2005. The safety officer at Quality Life Concepts reviews the drills

and keeps these records in her office. Fire extinguishers and smoke alarms were found in working order at all sites.

Emergency back-up was discussed in the staff surveys. All responded that they call the chain of command beginning with the Resource Coordinator of the home should an emergency develop.

Supported Living:

Folks served through Supported Living reside in their own homes or apartments in the community. Quality Life Concepts now has a transitional living complex in Great Falls. The Developmental Disabilities Program had some concerns about the appropriateness of the apartments but Quality Life Concepts has been addressing this gradually. Lynn Morley reported that the gas ranges will be replaced with electric ranges and the stairs will have railings.

Quality Life Concepts does safety drills and documentation of this was found in files. Training was provided if necessary on how to exit in an emergency. The Safety Officer reviews quarterly drills for Supported Living. Emergency and on call numbers are posted in all sites.

There have been some instances where the apartments of some of the individuals in Supported Living were filthy. This appears to have been addressed appropriately by Quality Life Concepts.

To Quality Life Concepts' credit, they have been able to increase supervision for some individuals in Supported Living who have required more staff time than in their plans.

Quality Assurance Observation Sheet # E-4

ii. SERVICE PLANNING AND DELIVERY

Individual Planning (Assessment, implementation, monitoring)

IP planning was found in most files and most objectives appeared to be implemented in a timely fashion. A couple of the sample files reviewed had some, but not all, of their objectives started on time. A few of the sample folks did not have current IPs or protocols in their books. Some paperwork was found on the computers or in the staff offices, not filed yet; when it was brought to the attention of the staff working they were missing, they were located. Staff working in the homes did not always sign protocols as indicated would be the case in the IPs. It did not seem to matter if there was a Resource Coordinator or not if IPs were in order or not. Despite one Resource Coordinator having a checklist for IP specifications and addressing problems at staff meetings, it appears the overall the quality of the IP implementation at Quality Life Concepts residential services could use improvement. Consistent implementation of

behavioral programs has been a concern for some consumers () but with the certification of an IABA consultant this year, improvements are already noticeable.

Group home and Supported Living staff completed assessments and they were found in most, but not all files. Satisfaction was usually noted in the IP. Some individuals had incomplete IPs: one individual () had no satisfaction survey from previous a IP, Supported Living safety considerations section of IP form 14 was crossed off as not applicable, and the legal/financial section was incomplete. This is also a Case Management issue, but as the provider, Quality Life Concepts has a responsibility to provide the Case Manager with the information needed to complete an IP properly. The provider normally supplies this information. Individual preferences were not always addressed in the IP.

Some IP objectives were not always clear or measurable and did not always match long-range goals. Some consumers () had long-range goals were lumped together as one when in fact there were 3 or 4 distinct goals. Some IPs for individuals new to services appeared incomplete. It is impossible to have a comprehensive plan without identifying all aspects of the individual's life. In some instances objectives could have been added as the staff became more familiar with the person. The quality of the IPs was an issue in previous Quality Assurance reviews for Quality Life Concepts.

Data sheets for individuals on motility drugs were found in files during this review and this was an improvement from last review. But the data was not always present.

Quality Assurance Observation Sheet # 8

Leisure / Recreation

Consumers interviewed participated in a variety of recreational/leisure activities of their choice. Art classes and Special Olympics were a few preferred activities. Hobbies done at home included painting, puzzles, reading, and games. A few activities were questionable as being leisure or not. It appears to be more of a description error after discussing some of the entries with the Resource Coordinators. Some activities listed as rec/leisure were indeed administrative in nature. This has been an issue in previous Quality Assurance reviews for Quality Life Concepts. Overall, it appeared there has been improvement since the last review in this area.

Client Rights (restrictions/promotion of rights, grievance procedure)

Some group home individuals have rights restrictions in place. One of the sample folks () appeared to have a restriction that was not documented as part of the IP process. It is noted in her interaction protocol, but no rights restriction form could be found with her IP. The IP team needs to address this.

No rights restrictions were found with Supported Living consumers who were sampled. Staff people were aware of client rights and review them with the consumers annually for IP meetings. In fact some of the staff promoted individuals' rights.

Medical / health care

Health care was monitored for the most part by Quality Life Concepts staff. Some consumers have families who are very involved in their care and keep track of and attend medical appointments with them. Medications and medical appointments are documented and placed in file. There have been issues with consumers not receiving annual exams and follow up appointments. This has been addressed with the Resource Support Specialists as the problems were discovered. Supported Living has a system developed to prevent this from happening again as a Quality Assurance Observation Sheet response. It was to be used agency-wide as some group home individuals also did not receive annual examinations.

The Developmental Disabilities Program has had concerns about the lack of a nurse at Primrose group home due to the medically fragile status of the folks who reside there. Having a nurse on staff was a part of the proposal with the state when Quality Life Concepts took the 5 individuals from MDC. It appears that Quality Life Concepts has recently hired not one, but two nurses. This will allow Quality Life Concepts to adequately address consumer health concerns in that home.

Meals were a concern during the on-site visits since many were conducted when meals were being prepared or served. Although there are reports that a nurse reviews the menus, several of the meals appeared to lack appropriate nutrition. Fried and starchy foods were the main dishes with little or no fruits and vegetables included were found in several homes. One consumer on a restricted salt diet had no documentation in her file to show how much sodium she was getting each meal. The Resource Coordinator of that group home responded quickly by giving a copy of her menu with sodium amounts listed. **Information from PLUK regarding nutrition is included in this review for Quality Life Concepts' use in developing healthy menus.**

Emotionally Responsible Care Giving

This Quality Improvement Specialist witnessed Quality Life Concepts staff people demonstrating emotionally responsible care giving. Staff gave support and provided appropriate training for independence. Many choices were given to consumers regarding preferences and plans appeared to be individualized.

Consumer Surveys

The Quality Improvement Specialists reviewed consumer surveys. It appears that choices were clearly given to folks regarding how they spend their time, with whom, and where. Consumers seemed happy with their living arrangements. Some had moved to different locations since last review. Case Managers completed surveys with each client. They were filed with the IP documents.

Agency's consumer satisfaction surveys (do you? what info? what do you do to address?) (accreditation requirement)

Quality Life Concepts does a satisfaction survey with their consumers and it is usually found with the IP.

iii. STAFFING**Screening/Hiring**

Policies were reviewed and seemed appropriate.

Orientation/training

Direct support staff reported they were satisfied with the training they have received at Quality Life Concepts. Some reported that they were allowed extra time before working on shift alone if they felt uncomfortable at first. Quality Life Concepts keeps documentation of all the training that is done including attendance and what topic was presented. Copies continue to be sent to the Developmental Disabilities Program as part of the completed Corrective Action Plan.

Ratios

The Quality Assurance Policy requires the Quality Improvement Specialist to look at staff to consumer ratios. Region II is currently part of the rates project where ratios are not required but are included in individualized cost plans. Because the health and safety of the individuals served by Quality Life Concepts still need to be met and adequate staffing still needs to be considered, ratios were looked at. Group home ratios of staff to consumers remain a concern at some group homes. Ratios are currently not a concern for Supported Living; services are received according to the cost plan on an individualized basis. There has been some question with

the new rates system about how Supported Living services will be tracked.

Quality Assurance Observation Sheet # 9

Staff Surveys

The Quality Improvement Specialist completed surveys with Supported Living staff. Questions were answered within guidelines sometimes with a little prompting. Quality Life Concepts also completes staff surveys as part of their Quality Assurance process. They are on file in the Human Resources office.

iv. INCIDENT MANAGEMENT

APS

Quality Life Concepts has met with APS to discuss reporting issues. There is documentation of actions have been taken by APS in the past year concerning maltreatment being indicated. Although records from Adult Protective Services are incomplete incidents occurred with residents residing in group homes and in Supported Living services. Adult Protective Services has an open file on a consumer who attends SOAR and resides in a group home who is aggressing towards other consumers.

Incident Reporting

This was addressed in the administrative review area with a Quality Assurance Observation Sheet. It is worth commenting that the residential staff members are getting better at reporting incidents and following up when necessary.

B. Work/Day/Community Employment

Accomplishments

Quality Life Concepts maintains a large senior day program and a small community based day program that is looking for a home. Jan Cahill reported to this Quality Improvement Specialist, in February 2006, that they are in the process of looking at the possible purchase a large facility to house the community based day program. Quality Life Concepts also provides supported employment services. Clients are placed in jobs in the community when appropriate.

Dave Sutinen, the Day Activities Director, made the following comments on strides made in his division over the past year:

The values of the division are defined as:

community inclusion and interdependence: folks in the program participating in the same activities as others in the community –

specifically the inception of the Community Based Day Program in June 2005

person centered supports: individualization of services leads to an increased focus on satisfaction, greater competition to build and nurture positive relationships with all stake holders.

real pay for real work: Conrad Work Activity Center had an expansion in the number of people served this year. They currently provide work for people from Conrad, Shelby, and Cut Bank. The packaging contracts have given Quality Life Concepts publicity in the Tribune and featured articles on MSNBC and Newsweek. They also have their Employment Options Program.

Satisfaction: keeping people satisfied with services is the outcome Quality Life Concepts wants to achieve. Reorganization in October 2005 added a Resource Support Specialist to the Day Activities team who oversees the senior group homes and Community Based Day Program and SOAR programs. They anticipate continued expansion in day services.

Quality Assurance: Quality Assurance is what keeps Quality Life Concepts in line with oversight agencies. Quality Life Concepts places a high value on maintaining healthy and safe living and working environments. They work with licensing, the Developmental Disabilities Program, Vocational Rehabilitation, and have a 3-year accreditation by CARF.

Life long learning: all people have the ability to learn new skills over the course of their lives if they are presented in a way that compliments their learning style.

looking forward: Quality Life Concepts Day Activities program's future focus is on building contracts and developing additional job supports for those who have work-related interests, focusing on recreational opportunities for those who don't want to work, and provide a happy medium for those who want both.

Programmatic Deficiencies

Programmatic deficiencies from the previous review were addressed in the administrative section of this review. New deficiencies will be noted in the specific areas where they occurred.

There are currently 4 vacancies for senior day that have not been filled for some time. Quality Life Concepts has been offered the option of amending their contract to include those slots in the Community Based Day Program, but until a comprehensive plan is

received from Quality Life Concepts on their day program and approved by the Developmental Disabilities Program Regional Manager, this cannot take place. **This was one of the issues from the completed corrective action.** When the Community Based Day Program was inceptioned in June 2005, it was with the promise of a comprehensive plan being turned into Developmental Disabilities Program for approval. A plan has not been approved yet. No new plan has been received since the corrective action was lifted.

i. HEALTH AND SAFETY

Vehicles

This information can be found in the previous and transportation sections.

Consumers

Quality Life Concepts has a total of 17 consumers receiving regular day services. 12 are at the Work Activity Center in Conrad. 2 consumers in Great Falls are receiving non-traditional day services and another 2 are in a Community Based Day Program. 2 consumers are receiving Supported Employment. 18 folks are participating in the senior day program. The Quality Improvement Specialists interviewed consumers and staff at all facility sites. All appeared satisfied with their services.

Medication Safety (psychotropics, training, programs, prns, certification, errors)

Medication documentation was looked at in all day service areas. Medications were stored in locked boxes and staff did double checks. Only med certified staff assisted with medications. Photos were present in the med books as an added safety measure. Copies for some prescriptions were found in the med books. Some PRN medication protocols could not be found. This was mentioned earlier in the residential section in a Quality Assurance Observation Sheet but applies in this service area as well.
(Quality Assurance Observation Sheet # 5)

Sites (appearance, evacuation drills, emergency back-up, etc.)

All day services areas were observed and reviewed. Attendance records for transportation and day services are kept at all locations. Monthly safety drills were on file at Quality Life Concepts in the Safety Manager's office and were looked at for frequency. Safety remains a priority at Quality Life Concepts. Supplies were adequate. All areas had MSDS books in accordance with OSHA requirements. Cleaning supplies were in locked cabinets in all locations. Inspections were completed with favorable

results. Fire extinguishers were in or near each area of day services and were checked within the last year. Fire extinguishers and smoke alarms were found in working order at all sites.

SOAR/ Community Based Day Program:

The day services areas were clean/sanitary and uncluttered. There is a large reception area where the staff people keep the consumers' books. Chairs are placed around the area and many of the seniors were seen people-watching in this area. The kitchen and dining room are separated and are separate from the main activity area. Supervision of the consumers appeared to be difficult. The laundry/storage area is through one room and into another away from the main area. Staff had to leave the main area where the majority of the folks were to get information for the Quality Improvement Specialists. The folks sitting in the reception area had little supervision. One needed support and was attended to by one of the Community Based Day Program staff. Evacuation routes were reviewed. Egress was adequate. Concerns remain about the method stairways are secured at SOAR. During the on-site visit more than one consumer was seen climbing over the chains to use the stairs instead of unlatching them or using the ramp. This has been mentioned during previous on-site visits during the review period to the staff as it has been seen during every on-site visit. When this was brought to the attention of the Resource Coordinator during this on-site visit she mentioned they "should do something about that."

There is a separate room for the 2 individuals served in the Community Based Day Program but they were both in the main room with the seniors during the on-site visit. The Quality Improvement Specialist was informed they did not go out today because of the on-site visit occurring. Although there is a calendar that lists community outings for every day and they are recorded on data sheets, there has not been one visit to this site during this review period by Quality Improvement Specialist or Case Managers where they have been in out in the community. It appears they are included in the senior day activities. It is recorded that they each have their own staff assigned to them but this Quality Improvement Specialist observed the staff assigned to them spending as much time with one of the seniors as with the other. When this was mentioned to the supervisor, she explained that when the individual is out of sorts they give him some space and keep returning to him. He was screaming and appeared to be hungry. Once staff started feeding him he was quieter. Hopefully once the Community Based Day Program finds a home these concerns will be adequately addressed.

Supported Employment is offered off and on-site to 2 consumers. Supported work remains a relatively limited program for the folks under the DD umbrella, although it is noted that there may be more active placements with VR clients.

There are three consumers who receive regular day services but not at a specific site.

CWAC

No site deficiencies were noted at the Conrad WAC. Sub-minimum wage certificate and licenses were current, and the physical environmental was clean and free of hazards. It is noted that in addition to a rather busy packaging schedule, folks in Conrad are able to participate in operations related to the Two Times New thrift store. Supported Work in Conrad has been sporadic, and although one consumer (BB) did have a job for a period of time this past year, jobs do appear to be hard to attain.

ii. SERVICE PLANNING AND DELIVERY

Individual Planning (Assessment, implementation, monitoring)

IP plans were reviewed for all the sampled folks. Most files had IP packets in them and staff had access to them. Quality Life Concepts completed Assessments and most were found in consumer files with the IP. Data sheets were sometimes difficult to follow. Data was sometimes being recorded for different objectives on the same data sheet or in the case of Community Based Day Program, the same data was recorded on two separate data sheets seemingly making more work for the staff. Some data sheets were missing in files. As with Residential services, some protocols and assessments were missing and information was not in files but found in stacks in offices.

Day staff members appear to be trained in specific protocols for consumers. Some objectives require review and sign off on a quarterly basis. This was not always the case. The Quality Assurance Observation Sheet concerning service planning and delivery will be shared between both service areas.

(Quality Assurance Observation Sheet # 8)

Leisure / Recreation

The day program site offered leisure and recreational activities to the consumers both on site and in the community. Participation was documented in each individual's chart. Community activities included parks, the mall, and 1:1 outings. Staff reported most outings occur when the weather is warmer.

Client Rights (restrictions/promotion of rights, grievance procedure)

Documentation that rights are reviewed with consumers each year prior to his/her IP meeting was found in files. Client Rights are promoted by staff.

Medical / health care

Medical and health care was usually handled by residential staff. Files had emergency contacts available. Med certified staff administered medications prescribed for administration during the workday. Double checks were completed. Communication takes place with residential staff concerning health issues. It appears for the most part the day staff people take care of medical needs if they occur at the day program.

Emotionally Responsible Care Giving

Personal observations of staff interaction with the consumers by Quality Improvement Specialist showed that the staff in Day services practiced emotionally responsible care giving. This was also evidenced by and the answers given in staff surveys.

Consumer Surveys

The Supported Employment and Day services consumers were asked questions about their satisfaction with job placements and work services in general. All appeared happy with the services they received and the staff providing it. One Case Manager remarked on behalf of one of her consumers in Supported Employment that she could work as little or as much as she wanted to and the flexibility offered by Quality Life Concepts was a good fit for her.

Agency's consumer satisfaction surveys (do you? what info? what do you do to address?) (accreditation requirement)

This information can be found in the administrative section of this review.

iii. STAFFING**Screening/Hiring**

As mentioned previously in the residential section of this review, policies were reviewed and seemed appropriate.

Orientation/training

Staff interviewed felt they were trained and oriented adequately. Several said they were not placed with consumers until they felt comfortable. One staff felt the training she received and how it was presented during induction was very valuable to her.

Ratios

At the time of the survey, the staff ratios seemed adequate in meeting the needs of the consumers in the day program.

Staff Surveys

Surveys were successfully completed with staff from work services.

iv. INCIDENT MANAGEMENT**Adult Protective Services**

No reports of maltreatment have been indicated by Adult Protective Services in work services. Adult Protective Services does have an open file on a consumer who attends SOAR and resides in a group home who is aggressing towards other consumers.

Incident Reporting

Incident Reports were in files. Incident Reports appeared to be written when appropriate and routed according to policy. See more comments in administrative section regarding the Quality Assurance Observation Sheet in this area. It is worth commenting that the Day staff members are getting better at reporting incidents and most of the time they follow up when necessary.

C. Community Supports**Accomplishments**

Community Supports with Quality Life Concepts continues to be a well-received, consumer driven program. The program has decreased to 8 consumers this year. Some consumers have ported their services to another provider; another was screened into a group home slot. The Community Supports program offers a variety of services from recreational and leisure types of activities, to individual educational programs, residential habilitation programs, to respite services. Consumers and their families appear to be pleased with the services received in this program. This reviewer is unaware of any current concerns or complaints expressed on or behalf of any of the consumers served in Community Supports. There continue to be some individuals who port to another provider from Quality Life Concepts Community Supports. It can be difficult to serve individuals and families in this service area due to the vast opportunities that can occur. Some complaints of those who left Community Supports included unkept promises.

Review was completed on all 8 consumers currently receiving Community Supports services. File review of the CSS agreement, the IP document, and information gathered over the course of the last year were considered. Consumer surveys were available for all consumers.

Someone in the community exploited one consumer receiving Community Supports services during this review period. It appears that this was not reported in a timely manner, but eventually with the assistance of Adult Protective Services, the individual was offered the supports he needed with this issue.

D. Transportation

Maintenance logs, insurance cards, and other transportation issues were available upon request.

Quality Life Concepts ensures insurance is current and maintenance of company vehicles is done regularly. Records are kept at the Center. Policies and training are in place for the safe transportation of the individuals served. Training includes safe operation of the lift, accident prevention and safe driving tips. Videos and checklists are used. A copy of the driving training curricula was provided to Quality Improvement Specialist. However, as mentioned earlier in this review, it appears training is not enough to ensure the safety of the individuals served at Quality Life Concepts.

Fire extinguishers were present in the vehicles the surveyor looked at.

Accomplishments

Quality Life Concepts noted no accomplishments in this area. This Quality Improvement Specialist feels Quality Life Concepts has a quality training program and unfortunately there have been some serious incidents in the past year with transportation issues.

Programmatic Deficiencies

This is noted previously in the administrative section.

Conclusion

Findings Closed

Findings Open / Plan of Correction